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 TERIX COMPUTER COMPANY, INC.

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

ORACLE AMERICA, INC., a Delaware
 corporation; ORACLE INTERNATIONAL
 CORPORATION, a California corporation

Case No.: 3:16-cv-02090-JST

Plaintiffs,

**STIPULATION AND ~~PROPOSED~~
 ORDER TO MODIFY CASE
 MANAGEMENT DEADLINES**

v.

BERND APPLEBY; JAMES OLDING;
 TERIX COMPUTER COMPANY, INC., a
 California corporation; TUSA, INC., a
 Delaware corporation; ERMINE IP, INC., a
 Delaware corporation; and ERMINE
 SERVICES, LLC, a Delaware company; and
 DOES 1–50,

Defendants.

This Stipulation to Modify Case Management Deadlines is entered into by and between plaintiffs Oracle America, Inc. and Oracle International Corporation (jointly, “plaintiffs”) and defendants Bernd Appleby, James Olding, Terix Computer Company, Inc., TUSA, Inc., Ermine IP, Inc., and Ermine Services, LLC through their respective counsel of record.

WHEREAS, on April 22, 2016, the Court entered the Order Setting Initial Case Management Conference and ADR Deadlines (ECF No. 12) providing for the following schedule:

- June 29, 2016: deadline for the parties to meet and confer regarding initial disclosures, early settlement, and discovery plan; deadline for parties to file ADR Certification and deadline for filing of either Stipulation to ADR Process or Notice of Need for ADR Phone Conference
- July 13, 2016: deadline to file Rule 26(f) Report, complete initial disclosures or state objections in Rule 26(f) report, and file Case Management Statement
- July 20, 2016: initial case management conference

WHEREAS, in light of plaintiffs’ proposed filing of an amended Complaint, the Parties have conferred about the timing of the Rule 26(f) Conference;

WHEREAS, the Parties have reached an agreement to continue the Rule 26(f) Conference;

NOW, THEREFORE, the Parties hereby stipulate, and ask the Court to order, as follows:

- The deadline for the parties to meet and confer regarding initial disclosures, early settlement, and discovery plan and the deadline for parties to file ADR Certification and deadline for filing of either Stipulation to ADR Process or Notice of Need for ADR Phone Conference is modified to July 15, 2016.
- The deadline to file Rule 26(f) Report, complete initial disclosures or state objections in Rule 26(f) report, and file Case Management Statement is modified to July 29, 2016.
- The date for the initial case management conference is modified to August 10, 2016.

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1 Dated: June 29, 2016

MORGAN, LEWIS & BOCKIUS LLP
Thomas S. Hixson
Spencer H. Wan

4 By: /s/ Thomas S. Hixson

Thomas S. Hixson
Attorneys for Plaintiffs
Oracle America, Inc. and Oracle
International Corporation

7 Dated: June 29, 2016

LANDAU GOTTEFRIED & BERGER LLP
Peter M. Bransten

10 By: /s/ Peter Bransten

Peter Bransten
Attorneys for Defendants Bernd Appleby,
James Olding, Tusa Inc., Ermine IP, Inc.,
And Ermine Services, LLC

13 Dated: June 29, 2016

HOPKINS & CARLEY
Monique D. Jewett-Brewster

16 By: /s/ Monique D. Jewett-Brewster

Monique D. Jewett-Brewster
Attorneys for Defendant
Terix Computer Company, Inc.

ATTESTATION

I, Thomas S. Hixson, am counsel for Oracle America, Inc. and Oracle International Corporation. I am the registered ECF user whose username and password are being used to file this Stipulation. In compliance with LR 5-1(i)(3), I hereby attest that the above-identified counsel concurred in this filing.

Dated: June 29, 2016

MORGAN, LEWIS & BOCKIUS LLP

By: /s/ Thomas Hixson

Thomas S. Hixson
Attorneys for Plaintiffs
Oracle America, Inc. and Oracle International Corporation

IT IS ORDERED that the foregoing agreement is approved and the deadlines are modified accordingly. In the future, the parties are strongly discouraged from waiting until the date a deadline occurs before moving for its enlargement

Dated: June 30, 2016

By: _____

